

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

**Hearing Date: July 24, 2014**  
**Hearing Time: 10:30 am**

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In re:

Vincent D. Iocovozzi  
Debtor

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Chapter 13  
Case No. 13-62035-6-dd

**REPLY TO BONNETTE L. IOCOVOZZI'S  
OBJECTION TO CONFIRMATION OF  
FIRST AMENDED CHAPTER 13 PLAN DATED MAY 29, 2014**

The Debtor, Vincent D. Iocovozzi, through his attorney, Carol Malz, herein replies to the Objection of BonNette L. Iocovozzi and states as follows:

1. That the Debtor re-iterates and affirms what he stated in his Reply to BonNette L. Iocovozzi's Objection to Confirmation and in his Reply to BonNette L. Iocovozzi's Supplemental Objection to Confirmation.
2. That the Debtor additionally points out that the corporation, V.J. Iocovozzi Funeral Home, Inc., has incurred net operating losses annually. Counsel for BonNette L. Iocovozzi was provided with a copy of at least one of the corporate income tax returns following the Meeting of Creditors, and no request has been received for any additional tax returns.
3. That the corporation is in arrears on paying its debts as well, and is continually incurring new debts, while paying old debts, in order to provide funeral services.
4. That the Debtor provided information on the corporation's assets and liabilities at Docket no. 53-2.
5. That the Order Determining Claims at Docket no. 73 controls the claims of BonNette L. Iocovozzi.

6. That BonNette L. Iocovozzi has not provided any information on her income, and therefore, there is no information from which to determine a disparity of income between her and the Debtor.

7. That the order for attorney fees and expert fees is not a domestic support obligation under 11 U.S.C. § 101, but are costs of litigation and an equitable distribution claim.

WHEREFORE, the Debtor respectfully requests that the court overrule the objections of BonNette L. Iocovozzi.

Dated: July 16, 2014

/s/ Carol Malz  
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